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Attorney for Debtor-in-Possession

E-filed on May 25, 2011

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

CASE NO: BK-N-10-51372-gwz

ROGER PIERRE BAYLOCQ,

Chapter 11

Debtor-in-Possession.

**ROGER PIERRE BAYLOCQ'S MAY 25,
2011, SUPPLEMENT TO HIS MARCH 4,
2011 DISCLOSURE STATEMENT AND
PLAN.**

Hearing Date: May 31, 2011
Hearing Time: 3:00 pm
Time Required: 1 hour

COMES NOW DEBTOR, ABOVE NAMED who supplements his March 4, 2011

Disclosure Statement as follows:

FIRST MODIFICATION (CLASS 4 - DELMONTE):

Explanation: Debtor and SunTrust Mortgage disagree over the ownership of 2370

Delmonte Lane, a property with a home and 5 apartments, income from which is critical to the Debtor's Plan. On May 3, 2011, Debtor submitted to counsel for SunTrust and US Bank its "2370 Delmonte Renovation Plan", attached hereto as Exhibit A, providing a more detailed proposed Plan treatment of this property, which proposal has not yet been accepted or rejected by SunTrust. If it appears during the scheduled May 31 disclosure statement hearing that this

1 title matter remains unresolved, Debtor has informed counsel for SunTrust that he will seek a
 2 continuance in open court for the sole purpose of allowing SunTrust sufficient time to evaluate
 3 Debtor's 2370 Delmonte Renovation Plan and otherwise determining issues relating to the
 4 treatment of SunTrust's claim
 5

6 Modification: Debtor adds the following at the end of the fourth full paragraph of
 7 Paragraph 3.2 of the Disclosure Statement "Attached hereto is additional language providing for
 8 Plan Debtor treatment of the Sun Trust Claim (Class 4), being Debtor's detailed "2370 Delmonte
 9 Renovation Plan." A copy of the 2370 Delmonte Renovation Plan, including the attached
 10 exhibits, is attached hereto as Exhibit A and incorporated herein at this place.
 11

12 Modification: At the end of paragraph 3.3 (Legal Proceedings"), add:

13 "Debtor has filed or will file an adversary proceeding in this court seeking an order
 14 quieting title to his Delmonte property, for the following reasons:

- 15 1. He received no notice of the trustee's sale;
- 16 2. The June 4, 2009 foreclosure sale was otherwise defective because the property was
 17 purchased at the foreclosure sale by SunTrust but the Trustee's deed vests title in U.S.
 18 Bank;
 19
- 20 3. SunTrust, claiming under oath that it owned 2370 Delmonte, filed a million dollar claim
 21 herein (Claim 16) on June 6, 2010, and did not withdraw the claim until 2/23/11, being a
 22 time after Debtor had filed its initial disclosure statement and plan relying on the income
 23 from the 5 Delmonte apartments. It is estopped to now claim that the Trustee's deed to
 24 US Bank (recorded 7/14/2009 following a June 4, 2009 foreclosure sale) is now valid,
 25 particularly as its agent conducted the foreclosure sale, prepared the Trustee's Deed and
 26 filed Claim 16 herein. "
 27

1 SECOND MODIFICATION (CLASS 6)

2 Explanation: On May 17, 2011, Phillip Hosking, Trustee of the Hosking Family
3 Trust, filed a Limited Objection asserting that he and not Ronald Corolla was the proper Class
4 6 Claimant. Debtor consents to the Limited Objection and therefore makes the following
5 modification:
6

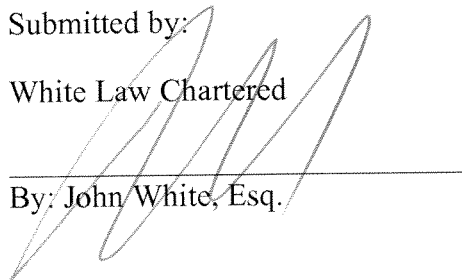
7 Modification: Paragraph 6.1 (Class 6) of the Disclosure Statement is amended to reflect
8 the pre-petition assignment of the Ronald Corolla \$200,000 claim, secured by 845 McLean/840
9 Cleveland, Fallon, NV to Phillip Hosking, Trustee of the Hosking Family Trust.

10 Subparagraph B(6) of Article III (Classification of Claims) and Paragraph C (Classified
11 Claims), Class 6: Ronald Corolla (Secured) of Article IV (Treatment of Claims) of the Plan
12 will also be corrected to reflect that the Class 6 claim is owned by Phillip Hosking, Trustee of the
13 Hosking Family Trust.
14

15 Dated: May 25, 2011.

16 
ROGER PIERRE BAYLOCQ

17
18 Submitted by:
19 White Law Chartered

20 
21 By: John White, Esq.
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26

Label Matrix for local noticing
0978-3
Case 10-51372-gwz
District of Nevada
Reno
Tue May 24 09:58:50 PDT 2011

CHASE HOME FINANCE, LLC
THE COOPER CASTLE LAW FIRM
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Aspen Valley Christian Foundation
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Cit# ENF10.P0464
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Alpharetta, GA 30009-8693

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Los Angeles, CA 90051-6804

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PHOENIX, AZ 85023-3113

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Wells Fargo Bank
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Portland, OR 97208-3908

Wells Fargo Bank, N.A.
BDD Bankruptcy Dept,
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RENO, NV 89503-4227

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Internal Revenue Service
P.O. Box 21126
DPN 781
Philadelphia, PA 19114

NV Energy
P.O. Box 30065
Reno, NV 89520-3065

U.S. Bank N.A.
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Cincinnati, OH 45201

Addresses marked (c) above for the following entity/entities were corrected
as required by the USPS Locatable Address Conversion System (LACS).

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Case No. CV09-02012
19919 Northeast 107th Avenue
Battle Ground, WA 98604-7451

United States Trustee
300 Booth Street #2129
Reno, NV 89509

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)State of Nevada
Division of Environmental Protection

(d)HARVEST TIME FOUNDATION
c/o Christopher D. Jaime, Esq.
Maupin, Cox & LeGoy
4785 Caughlin Parkway
Reno, NV 89519-0906

End of Label Matrix	
Mailable recipients	68
Bypassed recipients	2
Total	70

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Index of Exhibits

Exhibit A

2370 Delmonte Renovation Plan

(including exhibits)

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